

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

JOE OTERI, ET AL, DEFENDANTS

NO:5;12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

Ramon Addison, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time, 30 days and in the manner provided by the Federal Rule, sworn answers to each of the following interrogatories:

1. How many years have you been employed with the Philadelphia police department?
2. Were you the Sargeant on duty at the 1st district on October 6, 2010, and what hours?
3. Do you remember the Plaintiff Jo Ann Fonzone who was brought to the District on Oct.6,2010 from Citizens bank park?
4. If you remember her, do you recall what time she was brought to the District by Officers Ortiz and Person?
5. Is it police procedure for the transporting officers to remain at the district after the transport?

6. Did you call the transport officers to take Jo Ann Fonzone to the hospital Emergency Room on October 6, 2010 and do you recall about what time she was transported to the ER?
7. Do you remember approximately what time you signed the police report form to have Jo Ann Fonzone transported to Jefferson ER?
8. Did you sign the form prior to the transport or at a later time? If you signed it before the transport, did you then give the form to the transporting officers?
9. What is the police procedure for completing the form and when and by whom is that done?
10. If the transporting officers completed the hospital form, where do they get the information?
11. Are the transporting officers responsible for filing the police report form and where is the document filed?

12. When the injured person transported to the hospital by the police, is it police procedure to provide the individual with a copy of the VICTIM SERVICES FORM OR police report which states on the bottom:

"Pursuant to Act 185 of 1962, THE BELOW PERSON ACKNOWLEDGES RECEIPT OF
THE NOTIFICATION OF VICTIM SERVICES FORM.

13. Is the police report filed at the district where the individual was transported from or where the injuries occurred ? And is the police report filed at the City Hall police records office?

14. Are the transport officers responsible for filing the police report, when , where is this hospital transport police report filed?

15. Is there any reason and are there circumstances where and why the hospital police report would not be filed at the District of Records office ,or produced, disclosed, available, or made a public record (like other police reports are)?

16. While on duty at the 1st District , do you walk around to the jail cells to see and speak with those who have been arrested?
17. Do you remember if you walked around to the jail cells October 6, 2010, and at a approximately what time that was?
18. Do you recall seeing and speaking with Jo Ann Fonzone while she was in a cell where you noticed the swelling, bruises and contusions of her hand, arm, neck,chest and telling her she needed medical attention and would be taken to the hospital?
19. Do you remember Jo Ann Fonzone telling you that she was struck on her chest by a police officer 's nightstick after calling 911 for help, and was arrested at the game because a security guard had injured her head , then brought the officer to the scene?.
20. Is it police procedure for the transporting officers to inform the individual transported to the ER about the Crime Victims Assistance program and tell her that there is a mandatory police report of the incident and this report is required in order for the injured victim to receive compensation from the Crime Vicitms Board

Dated: May 23, 2016

Jo Ann Fonzone, Plaintiff

A handwritten signature in black ink, appearing to read 'Jo Ann Fonzone', written over a horizontal line.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL, DEFENDANTS

Marni Snyder, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within 30 days of service of such, and in the manner provided by the Federal Rules , sworn answers to each of the following Interrogatories:

1. Is it true that on December 28, 2012, you were appointed to represent Jo Ann Fonzone, who was not then present , on a disorderly conduct charge, not knowing that she had had the case dismissed with prejudice August 22, 2012 when she represented herself, or that prosecutor Kotchian appealed September 21, 2013 and had not served Fonzone with the appeal papers?
2. Is it true that you sent Jo Ann Fonzone a letter about your appointment but she did not receive the letter prior to your meeting or meet you until five minutes before trial Janaury 18, 2013?
3. Did you and Jo Ann Fonzone agree to act as co-counsel on her case?
4. As you and your co-counsel met just before trial , there was no opportunity for trial prep, interviews, to subpoena witnesses or to have witnessess testify other than co-counsel defendant Jo Ann Fonzone, is that right? Did Ms. Fonzone tell you the names of the witnesses she had subpoenaed but as prosecution kept getting continuances she did not know when the trial would actually occur?

5. Is it true that when you appeared in Judge Patrick's court January 17, 2013, after Jo Ann Fonzone had left the courtroom upon being threatened, you were unaware then that Jo Ann Fonzone had scheduled a hearing on her private citizen complaint against Joe Oteri, the security guard who had falsely implicated her by lying to the police after he had seriously injured her at her stadium seat, and you went there to represent her on her disorderly conduct case?

6. On January 17, 2013 you were unaware that there were two cases, cases nine and ten on the calendar that day in the same room 504 with the same Judge and the same prosecutor involving Jo Ann Fonzone, one with her being the complainant and one with her the defendant?

7. Have you read the transcript of January 17, 2013, which contained some of what occurred prior to your arrival: The Court crier called cases nine and ten, Ms. Fonzone stepped up, prosecutor Engle jumped in thereby disallowing Ms. Fonzone to inform the Court that there were two separate cases scheduled. Engle abruptly said, "Respectfully, your Honor, Ms. Fonzone is represented by Mami Jo Snyder." "I have spoken with her, she is not present yet today." The judge said, "All right. It's on hold then." When Jo Ann Fonzone tried to speak and tell the court that, "I represent myself on the private citizen complaint now," she was threatened with "I'm going to call the sheriff", then exited the courtroom.

8. When you arrived at 504 that day, did you know that there were two cases, one being a private citizen complaint against security guard Joe Oteri for assault, battery, false implication, harassment, conspiracy, did prosecutor Engle tell you about that complaint and that he as the state, not you, was supposed to represent her as the complainant?

9. Do you recall Mr. Engle knowingly tell the court, "Your Honor, for both nine and ten, which are motions filed by Ms. Fonzone who is now currently represented by Ms. Snyder, Ms. Fonzone was present in court at the first call of the list, she is no longer present. I move for dismissal."

10. Do you recall then saying, based on the misrepresentations of prosecutor Engle , " Being that my client is not here , I can't oppose.", the consequence of the dismissal being that Jo Ann Fonzone crime victim was denied her private citizen complaint hearing agasint the man who had injured then falsley implicated her in the criminal system to cover up his violent assault crime resulting in injuries to Ms. Fonzone's right hand, arm, shoulder, and bead truma causing seizure in the ER and concussion.
11. Do you remember upon meeting Jo Ann Fonzone and listening to her chronology telling her that you knew Kim Gray , (the defender associate who she had an hour long interview with and who had subpoenaed Ms. Fonzone's 911 audio from the police), and that you could provide an address for subpoena as she had left the Defenders office?
12. In your opinion, had the private citizen complaint hearing taken place January 17, 2013 the day prior to the Janaury 18, 2013 trial where you and Ms. Fonzone were co-counsel , and she was the defendant, do you think there would not have been a need for a trial on Janaury 18, 2013 ?
13. Though you were very effective at trial January 18, 2013, especially considering there was no time to prepare, as Ms. Fonzone was innocent , and expressed that she was the crime victim and certainly was not satisfied when prosecutor Kotchian whined and got her way (after you got the misdemeanor acquittal)with even a summary offense, had you discussed with her any post trial proceedings?
14. Ms. Fonzone filed a Motion to vacate summary conviction within the 10 days on Janaury 28, 2013 as she knew you were ill and might not meet the 10 day deadline, then you also had a Motion to vacate, do you recall whether you filed the Motion or walked it into the courtroom on Janaury 29, 2013? if you went to the courtroom, do you recall what the Judge said ?

15. Although the issue of whether Judge Eubanks did or did not vacate the summary conviction to this day remains nebulous, an appeal was filed February 11, 2013, is that true?
16. On February 12, 2013, there were several motions and two different matters before Judge Patrick, including appeal of the dismissal of her private citizen's complaint of January 17, 2013; an appeal of Patrick's dismissal or reconsideration of her 1013 dismissal from January 17, 2013; and a Motion to vacate the judgment on sentence of January 18, 2013 of Judge Eubanks; is it true that Engle objected to everything, continuously misrepresented facts to the court in order to make sure that there was never a hearing on the private citizen complaint against Oteri?
17. Ms. Fonzone's Private Citizen Appeal of Municipal court Decision on Citizen Complaint filed with Exhibits December 17, 2012 was in the court file, yet Engle, page 12 transcript Feb. 12, 2013 continuously misrepresented to Judge Patrick, "that did not occur", and therefore the Common Pleas court did not have jurisdiction. Do you recall prosecutor Engle being in denial of the court record and trying and succeeding in obtaining his objective by blatant lies to the court, just because Ms. Fonzone, on page 11, stated it was a conflict of interest for Engle and requested another ADA be assigned to the private citizen appeal, as he was to represent her as a victim on the private citizen case and was prosecuting her on the summary other case?
18. Do you recall that Judge Patrick set the next court date for March 4, and neither you or Ms. Fonzone was available that day, yet Engle kept talking about being ready for trial when there was an appellate motion to vacate to be heard on next date?
19. Do you recall asking Judge Patrick to recuse herself after she would not remove you from the case? When, how, and who removed you from the case as I stated February 12 that I wanted you to remain on the case because I was not available in March as I was getting treatment for my heart condition?
20. Do you know where did Engle false info that I had moved to Florida as he put that in a petition he filed?

21. Are you aware that I was not present or otherwise represented March 4 , 2013 or in May and could not appear until June 24, 2013 as I had been in a heart hospital and was recovering from the injury caused heart condition of October 6, 2010?

22. Are you aware that on June 24, I asked Judge Minehart if you could be reappointed as you knew the facts and the law better than any other lawyer I saw throughout this very long travesty?

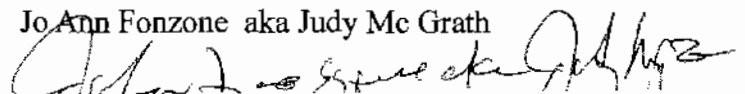
23 Do you remember me coming to your office to talk to you about second appointed lawyer Richard Patton after he prejudiced Judge Foglietta against me by writing a derogatory libelous letter to him before I ever entered his court room, and telling you that I cannot get a fair trial with the Judge because of that?

24. Were you aware of a libelous newspaper article about me which caused other participants in this litigation to prejudge , treat unfairly , slander me? If so, how ,when and by whom were you made aware of the article do you know I have a defamation action pending regarding this destructive , untrue ,inaccurate, heinous, libelous , retaliatory article?

25. Are you aware that you are the only of the three appointed and three private lawyers who I have respect for as being loyal and working diligently for her client, and I want to say thank you.

June 25, 2016

By: Jo Ann Fonzone aka Judy Mc Grath

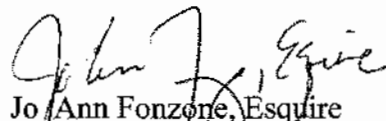


CERTIFICATE OF MAILING

I, Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have this day caused to be served a true and correct copy of non-party Interrogatories upon the following at the address as appears below:

Marni Jo Snyder, Esquire
100 S. Broad St.
Suite 1910
Philadelphia, Pa 19110

June 25, 2016


Jo Ann Fonzone, Esquire
2242 Tilghman St., 1C
Allentown, Pa 18104

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE aka JUDY MC GRATH, PLAINTIFF

VS.

NO. 5:12-CV-5726
JURY TRIAL DEMANDED
CIVIL ACTION

JOE OTERI, ET AL, DEFENDANTS

Terry Melcher, non-party to the above titled action, is requested to file with this court and serve upon the undersigned counsel for Plaintiff, within the time and in the manner provided by the Federal Rules, 30 days from the service, sworn answers to each of the following Interrogatories:

1. Where are you currently employed and what is your job title?

2. Were you ever an employee of the State of Pennsylvania and if so, where, at what agency, what was your position and job title?

3..As Director of the Pennsylvania Right-To-Know Office in Harrisburg, what were your job responsibilities and how many employees did you have working for you?

4. What is the percentage of records requests were granted by government agencies upon first request , and what is the percentage of requests had to go through the record request appeal process?

5. What percentage of requestors ever got copies of records which they requested according to the Right To Know Law?

6. Was it your responsibility to read the requests made by requestors , or some of them?

7. Plaintiff Jo Ann Fonzone Esquire , has, through the years , made several requests with the Right -To -Know law, including the above titled action, and has corresponded with the RTK office, does her name sound familiar to you?

8. There are several letters signed by you to Jo Ann Fonzone, Esquire regarding RTK requests, is her name familiar to you now?

9. When , how and why did you become an employee of the law firm Pepper Hamilton LLP in Philadelphia, Pa?

10. Did you apply for a position with Pepper Hamilton or were you approached and recruited by someone, and who was that?

11. Upon your departure from employment at the Right-To-Know office , were you required to sign any non-disclosure or other type of agreement prohibiting you from discussing any records requests or appeals ,taking or providing documents or information obtained at the RTK office to anyone?

12. If so, when , where and by whom was this agreement signed and witnessed, and what is the exact verbatim content of the agreement? Or, was it verbal agreement so as to avoid unfair advantage over any litigant who may have litigation where Pepper Hamilton LLP is representing the opposing parties?

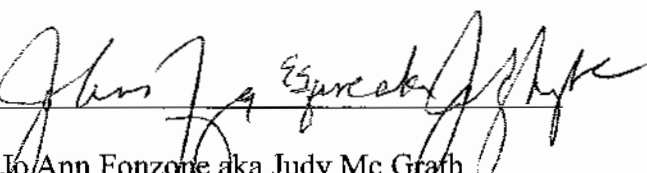
13. When you began employment at Pepper Hamilton, were you aware of the defamation lawsuit the firm was defending and that the Plaintiff was Jo Ann Fonzone?

14. If you were not aware then, when did you become aware of the defamation lawsuit?

15. Do you think that there is an actual , potential or even possible impropriety and/or conflict of interest present in this and/or the defamation action because you had knowledge and access to information about Jo Ann Fonzone's prior litigation and records requests and the reasons therefore, while the Director at the Right-To-Know office ,and now you are employed at the law firm representing the defendants in Jo Ann Fonzone's defamation action?

Date: June 30, 2016

BY:


Jo Ann Fonzone aka Judy Mc Grath
2242 Tilghman St., Allentown, PA 18104

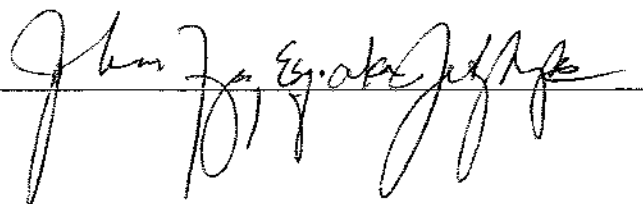
CERTIFICATE OF SERVICE

I Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have on this day caused to be served a true and correct copy of the Interrogatories to Terry Melcher on this date and at the address as set forth below by U.S. Mail:

Terry Melcher, Esq.
Pepper hamilton, LLP
3000 Two Logan Square
Philadelphia, Pa
19103-2799:

June 30, 2016

By:

A handwritten signature in black ink, appearing to read "Jo Ann Fonzone, Esq. Aka Judy Mc Grath", written over a horizontal line.

Jo Ann Fonzone, Esq. Aka Judy Mc Grath

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PLAINTIFF'S INITIAL DISCOVERY DISCLOSURES

Pursuant to federal Rule of Civil Procedure No. 26 (a), Plaintiff provides the following information:

Fed.R.C.P. No. 26 (a) (1) (A);

Plaintiff identifies the following persons as likely to have discoverable information that may support its claims in the above -captioned matter. As discovery in this matter is continuing, Plaintiff reserves the right to supplement this information as required.

- | | |
|---|---|
| 1. Police Sargeant Ramon Addison | 1 st District |
| 2. Police Lieutenant Appleton | Internal affairs |
| 3. John Evans | Internal affairs |
| 4. Cheryl Gaston, Esquire | 1622 Spruce St., Phila. Pa |
| 5. Jennifer Lin, Esquire | Phila. District Attorneys's office |
| 6. Police officer Michael Dwyer | Phila. Police dept. |
| 7. Police officer Connell | Phila. Police dept. Headquarters |
| 8. Kim Gray, Esquire | Phila. , Pa |
| 9. Police Officer Alexander | 11 th St. Police district |
| 10. Richard Strouse | Phila. Phillies |
| 11. Frank Fina, Esquire | last known Phila. District Attorney office |
| 12. Harold Dunbar, Chief Deputy State AG | Pennsylvania Attorney General |
| 13. US Attorney Philadelphia | 615 Chestnut St. Phila. |
| 14. Judge Gerald Kosinski | 1301 Filbert St. Phila. |
| 15. Bruce Hart, M.D. | Jefferson Memorial Hospital ER 2301 Broad St. Phila |
| 16. Jefferson Emergency Room staff members | as above |
| 17. James O'Brien, bail commissioner | Phila. Police headquarters |
| 18. Mrs. Michael Fonzone | 2242 Tilghman St. , Allentown, Pa |
| 19. Tina Mellenberg | 2011 Walbert Ave., Allentown, Pa |
| 20. Jimmie Schaffer | 1887 Redwood Drive, Whitehall, Pa |
| 21. Jack Ferryman | 3779 Huckleberry Rd., Allentown, Pa |
| 22. Trans Bridge bus driver Sean Oct. 6, 2010 | 2012 Industrial Drive, Bethlehem, Pa |
| 23. Terry Melcher, Esquire | Pepper Hamilton 3000 Arch St., Phila. |
| 24. Claire Wischusen, Esquire | 2700 Kelly Rd. Warrington, Pa |
| 25. Police Advisory Commission, Kelvin Anderson | Spring Garden St. Phila. Pa |

26. Former Police Commissioner Ramsey c/o Phila. Police dept.
27. Abigail Hurst Pa Coalition against domestic violence Harrisburg, Pa
28. Bench warrant Unit Arch St., Philadelphia
29. Frankford Hospital Emergency Room staff Frankford Ave. , Philadelphia, Pa
30. Marni Snyder, Esquire 100 S. Broad St. , #1910 Phila. PA
31. Todd Mosser, Esquire Phila. ,Pa
32. Jo Rosenberger, Esquire Phila. Law dept. 1515 Arch St.
33. Wayne Hower, VCAP Crime Victims Board, Harrisburg, Pa
34. Steve Turner, Esquire VCAP Crime Victims Board , Harrisburg, pa
35. Police officer Middleton Philadelphia, Pa
36. Police officer Mc Shea Philadelphia, Pa
37. Riverside medical staff Riverside Correctional facility, Phila.Pa
38. Annette Palmeri 1301 Filbert St. (Judge Neufeld clerk)
39. Douglas Earle, Esquire 1015 Chestnut St., 9th fl. Phila.
40. Richard Patton, Esquire 1223 Locust St. Phila. Pa
41. Don Bailey, Esquire Harrisburg, Pa
42. Chris Shipman ,Esquire Spring Garden St. , Easton, Pa
43. Judge Joyce Eubanks 1301 Filbert St., Phila. , Pa
44. Fred Wright, 1015 Chestnut St. , Phila.
45. David Bralow,Esquire Tribune, Chicago Ill.
46. Lance Gordon Phila. City Hall, rm. 311
47. Defender Associate Christine Gonzalez 1441 Sansum St. Phila. Pa
48. Wendy Spinosa, M.D. 3080 Hamilton Blvd., Allentown, Pa
49. Vladimir Koss, M.D. 1250 Cedar Crest Blvd., Allentown, Pa
50. Buster Smith, M.D. JFK Health Center 112 Broad St. , Phila.
51. Nancy Spengler, M.D. OAA 250 Cetronia Road, Allentown, Pa
52. Htwe Sein,M.D. Palm Beach Gardens, Florida
53. Lehigh Valley Cardiologists-Jain,Huang,Marcus 1250 Cedar Crest Blvd. Allentown Pa
54. Dr. Parker Beverly Hillis , Ca
55. Scott Stoll, M.D. Bethlehem, Pa
56. Steve Olex,M.D. Allentown, Pa
57. Lauren Reese P.A. 1501 Cedar Crest. Blvd., Allentown, Pa
58. Andres Zirlinger,M.D 1250 Cedar Crest Blvd., Allentown, Pa
59. Sacred Heart audiologist group 451 Chew St., Allentown, Pa
60. Randy Jaeger, M. D. 1621 Cedar Crest Blvd., Allentown, PA
61. Judge Brian Johnson 455 Hamilton St., Allentown, Pa
62. Robert Foster, Esquire Phila., Pa
63. Florence Juraitis Northampton, Pa
64. All individuals named in Plaintiff's filings Plaintiff will answer questions with veracity
65. Diane Scott 1301 Filbert St., Phila.
66. Jeff Saltzman , Esquire Phila., Pa
67. Highmark Blue Shield, Highmark Classic Blue P.O.Box 890173, Camp Hill, Pa
68. Chase Bank subpoena specialist c/o Chase bank, NY, Ny
69. Marc Frumer, Esquire Phila., Pa
70. Robert Dixon, Esquire Phila., Pa
71. Abigail Hurst Pa Coalition Against domestic violence, Harrisburg, Pa
72. Charlie McKenna, Asst. U.S. Attorney Newark, NJ
73. Kathleen Kane, Esquire Harrisburg, Pa
74. Charles O'Connor Pa Superior Court, Phila., Pa
75. Rick McSorley 1301 Filbert St. Phila.
76. Len Berman online sports writer, Port Washington, NY

77. Tim Ryan	Tribune Corp. , Chicago, Illinois
78. Stacey Brendlinger	Victims Comp.Assistance program, Harrisburg, Pa
79. Christopher diFusco	1515 Arch St. , Phila.law dept.
80. Municipal Judges Neufeld, O'Neill, Stack	1301 Filbert St. ,Phila.
81. Court of Common Pleas Judges Patrick, Minehart, Foglietta	1301 Filbert .St., Phila.
82. Jackie Coehlo,Esquire	3 S. Penn Square, Phila.
83. Seth Williams , Esquire	3 S. Penn Square, Phila.

Fed.R.C.P. 26(a)(1)(B)

Plaintiff identifies the following documents and materials that may support claims in the above captioned matter. As discovery in this matter is continuing, Plaintiff reserves the right to supplement this information as required.

Please refer to the documents and materials contained in Plaintiff's #1- 300 , attached herein as part of Plaintiffs' initial discovery disclosures.

Fed.R.C.P. 26 (a)(1)(C)

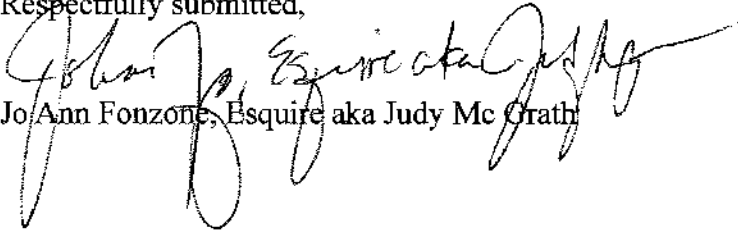
Plaintiff reserves the right to supplement these disclosures , especially medical reports ,as they are continuing , become available to her.

Fed.R.C.P. 26 (a)(2)(A):

At this time, Plaintiff has not yet determined what experts she will call to testify at the trial of this injury action, and requests additional time for this , to secure accurate contact info for some potential witnesses , and provide copies of listed documents. As discovery in this matter is continuing, Plaintiff reserves the right to supplement this information as required.

Date: October 6, 2016

Respectfully submitted,


Jo Ann Fonzone, Esquire aka Judy Mc Grath

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C. POLICE CITATION OF OCTOBER 6, 2010 SIGNED BY NOT AT SCENE OFFICER ORTIZ

D. POLICE HOSPITAL TRANSPORT REPORT SIGNED BY SARGEANT ADDISON

E. INTERNAL AFFAIRS REPORT OF LIEUTENANT APPLETON DESIGNATING PLAINTIFF A CONFIDENTIAL INFORMANT AND DETERMINATION OF VALID COMPLAINT

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H. INTERVIEW ON CD OF PLAINTIFF AT POLICE ADVISORY COMMISSION OFFICE OCTOBER 6, 2011

I. TRANSCRIPT OF PLAINTIFF'S DEPOSITION OF APRIL 21, 2015

J. TRANSCRIPT OF PLAINTIFF'S 911 CALL FOR HELP OCTOBER 6, 2010 AFTER BEING THROWN AGAINST THE WALL THE FIRST TIME BY OFFICER KELEWISCHKY

K. PLAINTIFF'S AFFIDAVIT NOTARIZED JUNE 26, 2012

L. PHOTOGRAPH OF PLAINTIFF AND FLORENCE JURAITIS OCTOBER 6, 2010 PRIOR TO PLAYOFF GAME

M. PHOTO OF SPORTS ILLUSTRATED CENTERFOLD OF OCTOBER 6, 2010

PLAYOFF GAME DEPICTING ALL FANS STANDING WITH RALLY TOWELS
N. POLICE HOSPITAL TRANSPORT # 42106 REPORT OF OCTOBER 6, 2010 SIGNED BY
SARGEANT ADDISON AND CONCEALED BY LAW ENFORCEMENT UNTIL JULY 3, 2012

O. CIVIL RIGHTS ENFORCEMENT COMPLAINT FORM SENT TO OFFICE OF PA
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P. CORRESPONDENCE FROM OAG TO JOANN FONZONE, ESQ. REGARDING LETTER
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FEBRUARY 11, 2013 BY CO-COUNSEL MARNI SNYDER

X. TRANSCRIPT REFLECTING DISMISSAL OF CHARGES AGAINST JO ANN
FONZONE BY JUDGE KOSINSKI AUGUST 22, 2012

Y. JO ANN FONZONE'S INTERVIEW WITH JOHN EVANS AND OFFICER CHRISTINE MC
SHEA JANUARY 28, 2011

Z. JO ANN FONZONE'S CORRESPONDENCE SENT TO KATHLEEN KANE OCTOBER 15,
2013

A. 1. JO ANN FONZONE'S RIGHT TO KNOW REQUESTS AND CORRESPONDENCE TO
LAW ENFORCEMENT AGENCIES AND THE RIGHT TO KNOW OFFICE

B.1. COPIES OF SUBPOENAS SERVED UPON 4 DEFENSE WITNESSES

C.1. TRANSCRIPT NOVEMBER 21, 2013 WITH ROBERT FOSTER, ATTORNEY
FOR JOE OTERI TESTIFYING WHILE JO ANN FONZONE WAS NOT IN THE
COURTROOM AS THE SCHEDULED DATE WAS CHANGED WITHOUT NOTICE
TO HER

D. 1 LETTER FROM JUDGE KOSINSKI DATED NOVEMBER 17, 2012 TO JO ANN FONZONE ADVISING HER THAT SHE COULD NOT FILE EXPUNGEMENT PETITION BECAUSE THEY HAD APPEALED

E.1. COPY OF JO ANN FONZONE'S EXPUNGEMENT PETITION SHE TRIED TO FILE

F. 1. COPY OF SUBPOENA OF OCTOBER 6, 2009 TO CHASE MANHATTAN BANK FOR RECORDS ANCILLARY TO PLAINTIFF'S DIVORCE ACTION

G.1 COPIES OF SUBPOENAS TO MTV NETWORKS, TIME WARNER, INC. FOR RECORDS ANCILLARY TO DIVORCE ONGOING SINCE 1993 AND IDTHEFT ACTIONS

H.1 Jo ANN FONZONE'S LETTER TO ADA KOTCHIAN JUNE 2012 REGARDING DISCOVERY DOCUMENTS NOT YET PRODUCED THOUGH ORDERED BY FOUR MUNICIPAL COURT JUDGES

I.1. COPY OF COMMON PLEAS COURT ORDER IN DIVORCE 2006

J.1. AFFIDAVITS AND PHOTOGRAPHS

K.1. VCAP COMPLAINTS

L.1. COPY OF BENCH WARRANT ISSUED APRIL 2011 WHILE Jo ANN FONZONE WAS RECOVERING AFTER RECENT DISCHARGE FROM CARDIAC HOSPITAL

M.1. TRANSMITTAL LETTER FROM JEFFERSON HOSPITAL TO IA STATING ER RECORD SENT

N.1. IRS FORMS , FTC INFO REGARDING ID THEFT

O.1. U.S. ATTORNEY NY COMPLAINT OF 11/11/05 BY Jo ANN FONZONE

P.1. PARS

Q.1. LETTER FROM NY AG OFFICE 2005 REGARDING MTV NETWORKS

R.1. MEDICAL REPORTS (WILL BE SENT TO COUNSEL AND CHAMBERS)

S.1. COPY OF PRIOR COURT DOCUMENTS IN ACTIONS RELATED , BROUGHT IN AND MADE ISSUE BY DEFENDANTS AND NON-PARTY TO THIS LITIGATION TO PREJUDICE PLAINTIFF

Certificate of Service

I, JoAnn Fonzoni, Esquire hereby certify that I have caused to be served by U.S. Mail on this day true copy of Plaintiff's Motion To Compel Answers & Document Production, Plaintiff's Discovery Disclosures (2nd copy), and other Interrogatories, an Index of Documents pertinent to this action and those that defendant brought into this Action in order to prejudice the Court against a Plaintiff.

By: JoAnn Fonzoni Esquire
JoAnn Fonzoni Esquire

Dated: 5/31/19